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DEBORAH L. DOBBIN

January 25, 2024

VIA ECF

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Ms. Louise Blouin,
Mr. Mathew Kabatoff
Authorized signatory of
Aberdeen Enterprises (BVI) Ltd. &
Brickchurch Enterprises (BVI) Ltd.

Re: Brickchurch Enterprises, Case No. 22-70914-ast & Aberdeen Enterprises,
Inc. Case No. 23-72834.

Dear Ms. Blouin and Mr. Kabatoff,

Pursuant to the Court's order relieving this firm as counsel, I was to provide you as to upcoming matters in the case. You had already been well aware of the sale order and process as well as the auction date. As you also know, the sale took place yesterday with a sale in the amount of \$ 79,000,000.00 having been the high bidder plus the buyer's premium.

What you also need to know is that the United States Trustee's Office has filed a motion to convert or dismiss this case which is returnable on February 13, 2024 at 10:00 a.m. That is also the adjourned date for all of the other myriad motions in the case, including the approval of the sale and confirmation of both plans. The Lender also filed an emergency motion yesterday to appoint Gary Herbst as the plan administrator to receive the purchase price for the properties. That order has not yet been entered.

The tax counsel that it looks like you retained and was approved has moved to be relieved as counsel, because they were improperly paid from the DIP account. You, in what I assume was your individual capacities, have filed numerous motions and requests for relief. As of now you are, or soon will be, without the benefit of counsel and I strongly urge you to retain new counsel as the sales proceeds seem insufficient to ensure that you will not be liable for a deficiency judgment.

Thank you.

Very truly yours,

s/Avrum J. Rosen